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## Complaint - FY2016 E-rate Product Substitution Problem

1 message

**Ben Goldman** <bgoldman@colemangroupconsulting.com>  
To: complaints@usac.org  
Cc: Jessica Martens <jdwyer@colemangroupconsulting.com>

Tue, May 29, 2018 at 12:55 PM

Hello,

My name is Ben Goldman, I work for Resource Renewal Project as an E-rate consultant in Chicago, IL. (CRN #16062788)

We have had an ongoing issue regarding two 2016 product substitutions that has yet to be resolved. We first brought it to USAC's attention in August of 2017, and though we have made numerous phone calls, customer service cases, and requests for escalation, there has been very little movement or action on the issue since. We are now at risk of losing about \$8,000 in committed funding for the affected entities.

We filed an appeal in August 2017 to process one of these 2016 product substitutions, which we were unable to submit through the standard product substitution mechanism in EPC. This appeal number is #58997. We filed a second appeal in September of 2017 for a different FRN that had the same issue. This appeal number is #66616. The reason we were unable to file the product substitutions was because it involved moving funding from one line item to another (while still resulting in an overall reduction in the FRN). In this circumstance, we were instructed to file an appeal (Case #187470). We do have at least one case of an appeal of this nature ultimately being approved (Appeal #55008).

On November 21, appeal #58997 was dismissed, stating that we should now be able to file the substitution through the standard form in EPC. However, we were not able to associate the FRN; we only saw a list of the FRNs that we had already filed substitutions for in the past. We opened a case with USAC (Case #207575) stating that the appeal should not have been dismissed because we are still not able to complete the product substitution. As of today, May 29, this case is still listed as "Pending USAC."

Another week later, on November 29, appeal #66616 was dismissed, citing the same reason as appeal number #58997. We were still unable to associate the proper FRN, so we opened case #208669 to again inform USAC that this appeal should not have been dismissed. This case was closed on January 24, stating that we could now file the product substitution, which was still inaccurate.

After case #208669 was closed, we called the SLD Helpline on February 5 to request an explanation for why these cases are being closed erroneously, and to try and expedite the process of finding a solution. Joshua Robinson at USAC opened a stakeholder case on this issue (Case #220990). In addition to escalating this issue, the intention was for this new case to now be the parent case for all customer service cases relevant to this issue.

Then, on March 28, case #207575 was updated by USAC, requesting a screenshot showing that we do not have the proper FRNs to associate. I then called USAC again to ask how I could request that this information also be uploaded to #220990. The representative instructed me to submit the screenshot, and also request the reviewer to refer this information to case #220990 as a "parent case." She said she would then leave a note for the reviewer of case #220990.

I subsequently received an email that case #220990 was closed. I called back right away to get the case reopened, but Ingaard Helms at USAC said she was unable to do so. Additionally, she said that she could find no reason why it was closed based on the most recent note that was left in the case. She said that the reviewer would know that the case was closed in error upon receiving notification. Additionally, she opened *another* case to investigate why case #220990 was closed (Case #232346), simply as a record of my call (the case was closed immediately). The case was never re-opened. This effectively de-escalated an issue that we had been experiencing for over 6 months at that point.

As a result of all of this, we are now at risk of losing the funding entirely, as the extended invoicing deadline is today, May 29.

Please contact me if you need any additional information or clarification. I can be reached via email at [bgoldman@colemangroupconsulting.com](mailto:bgoldman@colemangroupconsulting.com) or by phone at 312-635-7141.

Thank you.

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